

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

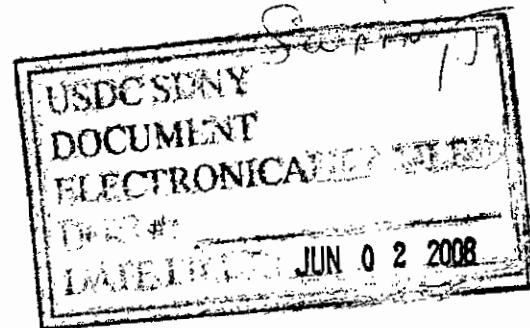
E.T.I. Euro Telecom International, N.V.,

Plaintiff,

v.

Republic of Bolivia and Empresa Nacional de
Telecomunicaciones Entel S.A.,

Defendants.



Case No. 08 CV 4247 (LTS)

**STIPULATION ON TIME FOR DEFENDANTS TO FILE OPPOSITION TO
MOTION TO CONFIRM EX PARTE ORDER OF ATTACHMENT AND TO
RESPOND TO SUMMONS AND COMPLAINT**

IT IS HEREBY STIPULATED AND AGREED by the parties in the above-captioned action, by and through their undersigned counsel, as follows:

1. Subject to further order of the Court or stipulation of the parties, each of the Defendants shall file its respective Opposition to Plaintiff's Motion to Confirm the Order of Attachment, entered on May 5, 2008 (hereafter, "Opposition") on June 3, 2008, through the ECF system, and provide counsel for Plaintiff with copies of such filing via e-mail or otherwise deliver them to counsel for Plaintiff on June 3, 2008, and by depositing same in the U.S. mail on that date.

2. Subject to further order of the Court or stipulation of the parties, Plaintiff shall file its Reply to each Defendant's Opposition on June 9, 2008, through the ECF system, and provide counsel for each Defendant with copies of such filing via e-mail or otherwise deliver them to counsel for each Defendant on June 3, 2008, and by depositing same in the U.S. mail on that date.

3. Each of Defendants shall answer or otherwise respond to the Plaintiff's Summons and Complaint within sixty (60) days from Plaintiff's depositing of same with Federal Express on May 12, 2008, that is, on or before July 11, 2008.

4. Service shall be timely under this Stipulation if made in the manner prescribed before midnight of the referenced day.

5. Nothing in this Stipulation waives, explicitly or implicitly, any right, privilege or immunity that the Republic of Bolivia or Empresa Nacional de Telecomunicaciones Entel S.A. ("Entel") may have, or any objections that either may have, with respect to the jurisdiction of the Court, service or purported service or otherwise, including such rights, privileges, immunities and objections under the Foreign Sovereign Immunities Act, 28 U.S.C. §1602 *et seq.*, and the Republic of Bolivia and Entel each expressly reserve same.

6. This Stipulation is without prejudice to Plaintiff's position that, save for this Stipulation, each of the Defendants was required to file an Opposition no later than May 30, 2008 and is without prejudice to each of Defendants' position that, save for this Stipulation, it was required to file an Opposition no later than June 3, 2008, and is similarly without prejudice to each of the party's position as to when, save for this Stipulation, each Defendant would have been required to answer or otherwise respond to the summons and complaint herein.

7. This is the first such Stipulation for setting the time for Defendants to respond to Plaintiff's pleadings.

Respectfully submitted,

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S.A.

Dated: May 29, 2008

SO ORDERD this 2 day of ^{June}~~May~~, 2008:

[Signature]
U.S.D.J.